REMARKS

Claims 1-3, 6-13 and 15-21 have been amended. Claims 4, 5, 14 and 15 and 22 have been cancelled. Claim 23 has been added.

The Examiner has rejected applicant's claims 1, 3, 11 and 13 under 35 USC 102(b) as being anticipated by the Suga, et al. (U.S. Pat. No. 6,313,875) patent. The Examiner has rejected applicant's claims 2, 12, 21 and 22 under 35 USC 103(a) as being unpatentable over the Suga, et al. patent. Claims 4-6, 9-10, 14-16 and 19-20 have been rejected under 35 USC 103(a) as being unpatentable over the Suga, et al. patent in view of the Enright, et al. (U.S. Pat. No. 6,583,813) patent. Applicant's claims 7, 8, 10, 17, 18 and 20 have been rejected under 35 USC 103(a) as being unpatentable over the Suga, et al. patent in view of the Enright, et al. patent, further in view of the Hatanaka (U.S. Pat. No. 6,438,320) patent. Applicant has cancelled claims 4, 5, 14, 15 and 22, thereby obviating the Examiner's rejections with respect to these claims. Applicant has amended independent claims 1, 11 and 21, and with respect to these claims, as amended, and their respective dependent claims, the Examiner's rejections are respectfully traversed.

Applicant's independent claim 1 has been amended to recite an image pickup apparatus comprising an image pickup <u>unit</u>, a recording <u>unit</u> that records <u>on the recording medium</u> image data photographed by the image pickup <u>unit</u>, a display <u>unit</u> that displays the image data recorded <u>on the recording medium</u>, an assigning unit that assigns to the image data, unique apparatus information for identifying the image pickup apparatus and image identifying information for managing in the image pickup apparatus the image data recorded on the recording medium, a communication <u>unit</u> that is connectable to <u>another</u> image pickup apparatus, for transmitting the image data recorded on the recording medium to the another

image pickup apparatus and receiving image data from the another image pickup apparatus, a modifying unit that modifies image identifying information added to the image data received from the another image pickup apparatus by the communication unit and generates modified image identifying information for managing the received image data in the image pickup apparatus, and a control unit that manages the image data received on the recording medium by the recording unit and the image data received from the another image pickup apparatus by the communication unit according to the unique apparatus information, the image identifying information and the modified image identifying information, wherein the control unit controls the display unit to display the image data received by the recording unit and the image data received by the communication unit from the another image pickup apparatus in different display configuration, respectively, in such a manner that the image data received by the communication unit from the image pickup apparatus and the image data received by the recording unit can be distinguished from one another. Applicant's independent claims 11 and 21 have been similarly amended.

The constructions recited in applicant's amended independent claims 1, 11 and 21 are not taught or suggested by the cited art of record. Applicant's invention, as recited in applicant's amended independent claims 1, 11 and 21, realizes management of image data recorded on the recording medium and image data received from another image pickup apparatus in one image pickup apparatus by assigning to the image data unique apparatus information and image identifying information and by modifying the image identifying information added to the image data received from another image pickup apparatus. None of the cited Suga, et al., Enright, et al. and Hatanaka patents teach or suggest assigning to the image data unique apparatus information for identifying the image pickup apparatus and image

identifying information for managing in the image pickup apparatus the image data recorded on the recording medium, modifying an image identifying information added to the image data received from another image pickup apparatus by the communication unit and generating modified image identifying information for managing the received image data in the image pickup apparatus, and managing the image data recorded on the recording medium and the image data received from the another image pickup apparatus according to the unique apparatus information, the image identifying information and the modified image identifying information.

The Suga, et al. patent discloses a teleconferencing system that includes a plurality of terminal stations (A-C) connected through a network, wherein each of the terminal stations is connected to a camera (A-1, B-1 and C-1). FIG. 1; Col. 4, lines 12-46. As shown in FIG. 2 of Suga, et al., the terminal station A is connected to camera A-1 and includes an interface circuit (116) connected to another camera (A-2) and an interface circuit (125) connected to another terminal and a server. FIG. 2; Col. 5, lines 16-18. Suga, et al. also discloses that a terminal (A) receives image data from the cameras (A-1, A-2) connected thereto and image data from another terminal (e.g. B or C) connected through the network, and displays the image data from the camera (A-1 or A-2) in one display window (FIG. 5; 201) and the image data from the terminal (e.g. B) received over the network in another display window (FIG. 5; 203). FIG. 5; Col. 5, lines 58-65; Col. 6, lines 27-47. Each display window (201-204) in Suga, et al. includes a title bar which displays a name identifying the corresponding camera. Col. 7, lines 13-18. The teleconferencing system is managed by the server which receives controllable items and parameters of each camera connected to each terminal and forms a table of the specification

and initial status of the camera; based on which the display window and a camera control menu are displayed on each terminal. Col. 7, lines 35-48.

Thus, the Suga, et al. patent only teaches that the terminal station is connected to another terminal and that the terminal station receives image data captured by the camera(s) connected thereto and image data from another terminal and displays the image data from its camera and the image data from the other terminal in different windows. However, Suga, et al. is completely silent as to assigning any image identifying information to the image data that is used for managing in the image pickup apparatus the image data recorded on the recording medium. Instead, the Suga, et al. patent only teaches obtaining controllable items and parameters of each camera, such as zooming, panning and aspect ratio of the camera, and not any identifying information of the image data, and that these items and parameters are used for controlling the camera, not for managing the image data.

Moreover, since there is no teaching or suggestion in Suga, et al. of the image identifying information assigned to the image data, there is also no, and cannot be any, teaching in Suga, et al. of modifying the image identifying information added on the image data received from the another image pickup apparatus by the communication unit and generating modified image identifying information for managing the received image data in the image pickup apparatus, or of managing the image data recorded on the recording medium and the image data received from the another image pickup apparatus according to the unique apparatus information, the image identifying information and the modified image identifying information.

The Enright, et al. patent also fails to teach or suggest these features. In particular, Enright, et al. discloses an image capturing system in which image signals captured by a plurality of cameras (e.g. 186, 188 and 190 in FIG. 11 or 206, 208, 210 in FIG. 12) are received and recorded in an image server (182 in FIG. 11 or 204 in FIG. 12). See, FIGS. 11 and 12; Col. 29, lines 6-53. Enright, et al. discloses that transaction data, such as account data, deposit or withdrawal amounts, time periods of transactions, etc., is also stored on the image server and can be correlated to the image data so that it can be used to search, identify and recover the image data from the server. Col. 20, line 66 to Col. 21, line 19; Col. 29, lines 23-30.

However, there is no mention anywhere in Enright, et al. of <u>modifying an image</u> identifying information added on the image data received from another image pickup apparatus by the communication unit and generating modified image identifying information for <u>managing the received image data in the image pickup apparatus</u>. Therefore, there is also no teaching in Enright, et al. of <u>managing the image data recorded on the recording medium and the image data received from another image pickup apparatus according to the unique apparatus information, the image identifying information and the modified image identifying information.</u>

Finally, the Hatanaka patent discloses a system for file managing of image data by generating a unique file name when storing the image data on a storage device, wherein the file name includes a three letter code and a numerical value in accordance with an updated value of a counter. Abstract; Col. 2, lines 1-13; Col. 5, lines 18-45. In Hanataka, there is no modifying of image identifying information added on the image data received from another image pickup apparatus to generate modified image identifying information for managing the received image data and no managing of the image data based on the unique apparatus information, image identifying information and modified image identifying information.

Accordingly, applicant's amended independent claims 1, 11 and 21, each of which recites assigning to the image data unique apparatus information for identifying the image

pickup apparatus and image identifying information for managing in the image pickup apparatus the image data recorded on the recording medium, modifying an image identifying information added on the image data received from another image pickup apparatus by the communication unit and generating modified image identifying information for managing the received image data in the image pickup apparatus, and managing the image data recorded on the recording medium by the recording unit and the image data received from another image pickup apparatus by the communication unit according to the unique apparatus information, the image identifying information and the modified image identifying information, and their respective dependent claims, patentably distinguish over the Suga, et al., Enright, et al. and Hatanaka patents, taken alone or in combination with one another.

In view of the above, it is submitted that applicant's claims, as amended, patentably distinguish over the cited art of record. Accordingly, reconsideration of the claims is respectfully requested.

Dated: September 22, 2008

COWAN, LIEBOWITZ & LATMAN, P.C. 1133 Avenue of the Americas New York, New York 10036

T (212) 790-9200

Respectfully submitted. Junitasio Phodino

Anastasia Zhadina Reg. No. 48,544

Attorney of Record